Renewable Energy Taskforce Pilot Program for the Procurement of SRECs April 24, 2012

Priority Questions for the Taskforce to Consider:

• What should be the process for making future decisions that have competitive implications, such as allocating SREC quantities among tiers and setting prices?

Design Goals:

1. Minimize costs

 How can the program be designed to minimize ratepayer costs given the other objectives set forth in REPSA?

2. Maximize in-state generation and manufacturing

 How can the program be designed with regard to the objective of "maximizing in-state solar renewable energy generation and local manufacturing," recognizing that REPSA includes 10% bonus provisions for in-state workforce and manufactured content?

3. Market Stability

- How can we avoid boom/bust cycles?
- How do we meet long term targets?
- How can we stay under price caps?
- How do we avoid structural oversubscription?

Design Elements:

| 1. Tier size and allocation | | Straw-man proposal |
|-----------------------------|--|--------------------|
| A. | Should procurements continue to be by | |
| | tier? | |
| В. | If so, how many should there be? | |
| C. | What should be the dividing line between | |
| | different tiers? | |
| D. | Is tiering by size only for "new" systems? | |
| E. | If so, what defines "new"? | |
| F. | If so, how much of the total amount goes | |
| | to "new" systems? | |

| 2. Pricing | | Straw-man proposal |
|------------|--|---|
| A. | Should SREC prices be set by competitive bidding, administratively-set pricing, or some combination of the two? If administratively-set pricing will be used again, what has been learned from the Pilot Program that would be useful in | Prices for smaller systems could be linked to auction prices in larger tiers by a percentage or fixed amount. |
| | future determinations of prices? | |
| В. | Treatment of systems with different grant values: How to estimate? Is it any for administratively set or all bids? | |
| C. | Treatment of systems by vintage? | |

| 3. Long term contracts | | Straw-man proposal |
|------------------------------------|---|--------------------|
| A. | What tiers and vintages should get long | |
| | term contracts? | |
| В. | What should be the contract length? (7, | |
| | 10, 15, 20 years?) | |
| C. | What happens to SRECs after the | |
| | contract? | |
| D. | How to ensure production in later years? | |
| | (Enforcement? Low prices?) | |
| | | |
| 4. Auction structure | | Straw-man proposal |
| A. | Why should owners bid through an | |
| | aggregator? | |
| В. | Is there sufficient site control to prevent | |
| | speculation? | |
| | | |
| 5. Ove | rall size of the next procurement and | Straw-man proposal |
| impacts on future years | | |
| A. | How many SRECs should be procured in | |
| | total relative to projected need for SRECs | |
| | (including concerns of boom/bust, 3 rd | |
| | party transfer contracts, and cost caps)? | |
| В. | How to address uncertainty and delay with | |
| | 3 rd party contract data? | |
| C. | How many auctions to have in the next | |
| | compliance year? | |
| | | |
| 6. Existing Systems (pre-Dec. 2010 | | Straw-man proposal |
| interconnection) | | |
| A. | How should consideration be given to pre- | |
| | existing solar installations in Delaware? | |
| B. | Should existing systems get medium-long | |
| | term contracts vs. annual purchases? | |
| C. | Should existing systems be allocated a | |
| | percentage of SRECs? | |
| D. | Should existing systems be competitively | |
| | bid vs. administratively set prices? | |
| E. | What happens to existing systems | |
| | (connected after Dec. 2010) that didn't get | |
| | a contract in the Pilot 1 0? | |

F. Will future procurements have any distinction by installation date?